

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WESTERN SECTION
CIVIL ACTION
NO. 05-30066-MAP

<u>MATTHEW J. NATLE,</u>)
Plaintiff)
)
v.)
)
<u>DENNIS O'CONNOR, et al.,</u>)
Defendants)

JOINT STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1 of the Local Rules of the United States District Court for the District of Massachusetts, counsel of record have conferred and state as follows:

1. Joint Discovery Plan and Motion Schedule:

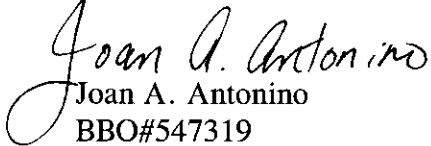
The parties propose the following pretrial schedule:

- (a) The parties shall complete their automatic disclosure on or before June 1, 2005.
- (b) All written discovery shall be served by July 29, 2005.
- (c) Counsel shall appear for a case management conference in September 2005 at a date and time designated by the Court.
- (d) Non-expert depositions shall be completed by January 31, 2006.
- (e) The plaintiff shall designate and disclose information regarding his trial experts as required by Fed. R. Civ. P. 26(a)(2) by March 31, 2006.

- (f) The defendants shall designate and disclose information regarding their trial experts as required by Fed. R. Civ. P. 26(a)(2) by April 28, 2006.
 - (g) All expert depositions shall be completed by May 31, 2006.
 - (h) Motions for summary judgment are to be filed by July 31, 2006 and responses are to be filed twenty days thereafter pursuant to Local Rule 7.1, and all filings must conform to the requirements of L.R. 56.1.
2. Certifications regarding each party's consultation with counsel regarding budgets and alternative dispute resolution will be filed separately with the Court.
 3. The parties have not agreed to proceed before a Magistrate Judge of this Court.
 4. The parties will consider the desirability of conducting phased discovery in which the first phase is limited to developing information needed for a realistic assessment of the case, and if the case does not terminate, the second phase is directed at information needed to prepare for trial.
 5. The plaintiff has submitted a settlement proposal to counsel for the defendants, and has offered to submit this case to mediation in an effort to resolve this case prior to engaging in protracted litigation.

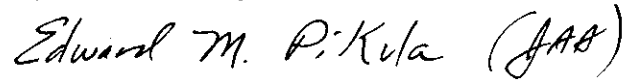
DATED: May 3, 2005

Plaintiff, Matthew J. Natle,
By His Attorneys,


Joan A. Antonino
BBO#547319

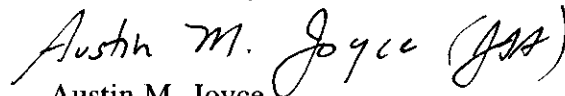
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Defendants,
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CERTIFICATE OF SERVICE

This will certify that this document was served upon counsel of record by 1st class mail on May 3, 2005.

